<u>REMARKS</u>

This application has been carefully reviewed in light of the Office Action dated October 11, 2005. Claims 3 to 12, 14, 15, 18 and 22 to 25 are in the application, of which Claims 3, 5, 8, 11, 14, 15, 18, 22 and 24 are independent. Reconsideration and further examination are respectfully requested.

As an initial matter, Applicants thank the Examiner for the indication that Claims 3 to 12, 14, 15, 18 and 22 to 25 would be allowable if rewritten in independent form.

Claims 1, 2, 13, 16, 17, 19 and 20 were rejected under 35 U.S.C. § 103(a) over U.S. Patent No. 6,111,767 (Handleman) and U.S. Patent No. 3,975,663 (Moorey). Claims 1, 2, 13, 16, 17, 19 and 20 have all been cancelled without prejudice or disclaimer of subject matter, and without conceding correctness of the rejections, but rather strictly to obtain an earlier allowance and to expedite issuance. The remaining claims are seen to be in condition for allowance for the reasons noted below.

In keeping with this indication of allowable subject matter, Applicants have amended each of Claims 3, 5, 8, 11, 14, 15, 18, 22 and 24 into independent form, and consequently these claims are seen to be in condition for allowance. The other claims in the application are each dependent from the independent claims, and consequently are also seen to be in condition for allowance.

Additionally, the Office Action repeated rejections of Claims 1 to 20 and 22 to 25 under obviousness-type double patenting in view of Claims 1 to 20 of U.S. Patent No. 6,320,769 (Kurokami '769). In response, Applicants respectfully direct the

Examiner's attention to the relevant prior arguments in support of patentability found in the

Preliminary Amendment And Statement Of Substance Of Interview filed on July 26, 2005.

Furthermore, Applicants respectfully direct the Examiner's attention to additional features

in the claims. For example, independent Claim 3 now recites "a controller that controls

potential to ground of various points on the power supply" and "the potential to ground of

each point on the power supply becomes a voltage for a detectable ground fault by said

detector." For at least these reasons, Applicants believe Claims 3 to 12, 14, 15, 18 and 22

to 25 are allowable.

No other matters being raised, it is believed that the entire application is

fully in condition for allowance, and such action is courteously solicited.

However, if the Examiner believes any outstanding issues remain, it is

respectfully requested that the Examiner contact Applicants' representative prior to issuing

an Office Action.

Applicants' undersigned representative may be reached in our Costa Mesa,

California office at (714) 540-8700. All correspondence should continue to be directed to

our below-listed address.

Respectfully submitted,

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